Postal Regulatory Commission Submitted 2/5/2016 2:21:27 PM Filing ID: 94911 Accepted 2/5/2016

BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

PUBLIC INQUIRY CONCERNING THE TERMS OF 39 U.S.C.404[D]

DOCKET NO. PI2016-2

COMMENTS OF DAVID B. POPKIN

February 5, 2016

Respectfully submitted,

PRCCOMMENTSPI20162

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Section 39 USC 404[d] relates to various actions that must be followed with respect to the closing or consolidating of post offices. The question arises as to the definition of what is a post office. As far as the public is concerned, a post office is a facility where one goes to transact postal business. Postal facilities that are staffed by postal employees can provide all of the services that the public can desire regardless of whether it is an independent post office or a classified station or branch. The distinction between an independent post office and a station/branch is not apparent to members of the public and therefore should not have a distinction made in actions that are taken in the closing or consolidating that facility. For example, the postal facility that covers the neighboring Borough of Englewood Cliffs, NJ [07632] is a branch of the Englewood Post Office [07631] and not an independent post office like the facility that covers the neighboring Borough of Tenafly, NJ [07670].

There are various types of contract post offices and they provide varying levels of service. Most of these facilities do nothing more than sell booklets of twenty forever stamps like the local supermarket in Englewood. While it may be convenient to be able to purchase a booklet of forever stamps at the local Shoprite supermarket in Englewood, one does not consider them to be a post office. Furthermore, since a

contract facility is run by non-postal employees, one cannot force them to retain their facility and/or provide the service.

The Postal Service has control over the various facilities that it operates and therefore should consider all facilities equally when the level of service is being changed. Even what may on the surface appear to be a minor change will be significant to local customers based on traffic patterns, availability of public transportation, availability of parking.

The relocation of a postal facility should be considered as a closing of one facility and the establishment of the new facility.

The Postal Regulatory Commission should establish guidelines for changes in closing or consolidating postal facilities and then should ensure that the Postal Service follows them.